



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 10

1200 Sixth Avenue, Suite 900
Seattle, Washington 98101-3140

Reply to OCE-164

October 2, 2009

Susan Smith
R.H. Smith Distributing Company, Inc.
315 E. Wine Country Road
Grandview, WA 98930

Dear Ms. Smith:

The United States Environmental Protection Agency (EPA) has selected your facility to conduct an underground storage tank (UST) system inspection at the following address:

**Smitty's Conoco
102 E. Toppenish Ave.
Toppenish, WA 98948
EPA Facility ID No. 4260087**

This inspection is scheduled for October 13, 2009 at around 11:00AM. At this time we will also be inspecting and potentially sampling any groundwater monitoring wells on-site. Keep in mind that the inspection may last 1 to 2 hours.

The purpose of the inspection is to evaluate whether your facility is in compliance with federal regulations that pertain to UST systems. During the inspection, we will be able to answer any questions that you may have on your system. Please take advantage of this opportunity to gain a better understanding of your UST system and the federal requirements. Also, please keep in mind that we are available to answer any questions you might have at any time, not just during inspections. Our main goal is to assist you in maintaining compliance with the federal UST regulations.

However, it should be noted that if an owner / operator does not make a good faith effort to obtain and maintain compliance, EPA has the authority to pursue any enforcement action deemed necessary as allowed by the law. Such enforcement action can include a fine of up to \$11,000 per day, per tank for each violation.

To adequately prepare for the inspection, please have the individual most familiar with your UST system available to meet with us. During the inspection, please have all areas that are normally secured in some manner (e.g. sump covers, fill caps, etc.) **UNLOCKED and/or UNBOLTED**. Also, have someone available to lift and remove covers from the UST equipment. If equipped with an overfill alarm, be prepared to make it sound. Also, there are several documents that you must have available at the facility at the time of the inspection. A list of these documents is enclosed with this letter.



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If you have any questions about the inspection or the documents that you must have on hand during the inspection, please contact me immediately at (206) 553-4012 or nenninger.philip@epa.gov. Thank you for your cooperation with this matter.

Sincerely,

A handwritten signature in blue ink, appearing to read "Philip A. Nenninger", with a stylized flourish at the end.

Philip A. Nenninger
UST Inspector

Enclosure

DOCUMENTS REQUIRED DURING AN EPA UST INSPECTION

1. Financial Responsibility / Insurance Documentation

- A "Certificate of Insurance" or "Endorsement" with associated paperwork listing the inspected facility as being covered under the policy
- In cases of self insurance, a signed copy of the current "Letter from Chief Financial Officer" and associated paperwork listing the inspected facility as being covered under the letter

2. Petroleum Release Detection

- Monthly inventory records for the past 12 months (e.g. statistical inventory, Automatic Tank Gauging [ATG])
- \$ Monthly monitoring records for the past 12 months if using interstitial monitoring or groundwater or vapor monitoring
- \$ If using an ATG, the manufacturer's "Results of U.S. EPA Standard Evaluation" or a "third party evaluation"
- \$ Equipment calibration, maintenance and repair records and schedules prescribed by the manufacturer to keep equipment functioning properly
- \$ Latest annual test of automatic line leak detectors (if your piping is pressurized)
- \$ Records of any tightness testing for each tank and associated piping

3. Repairs and Upgrades to UST Systems *(if any such work was made to your system)*

- \$ Repair records (e.g. invoices)
- \$ Photos of installation
- \$ Warranties with installation date and type of equipment
- \$ Paid invoices of equipment and servicing

4. Cathodic Protection (i.e. Rust Prevention) *(if you have steel tanks and/or piping)*

- \$ Plans/maps of the cathodic protection system
- \$ Integrity assessment (i.e. an inspection by a qualified cathodic protection tester per 40 CFR §280.31) if added to an existing tank
- \$ Test results of the last two corrosion system tests required within 6 months of installation and every 3 years thereafter
- \$ For impressed current systems, the results of the last three inspections as documented in your log of impressed current readings that are required every 60 days

5. Lined Steel Tanks *(if your tank is made of steel and is lined)*

- \$ Integrity assessment (i.e. an inspection per 40 CFR §280.21(b)(1)) if added to an existing tank
- \$ Internal inspection if lining is greater than 10 years old

